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**Case.net**Search for Cases by: [Judicial Links](#) | [eFiling](#) | [Help](#) | [Contact Us](#) | [Print](#)[GrantedPublicAccess](#) [Logoff JBRENTDULLE](#)**1622-CC11297 - KAYLA ROBINSON V CITY OF ST LOUIS MISSOURI ET AL (E-CASE)**[Case Header](#)[Parties & Attorneys](#)[Docket Entries](#)[Charges, Judgments & Sentences](#)[Service Information](#)[Filings Due](#)[Scheduled Hearings & Trials](#)[Civil Judgments](#)[Garnishments/Execution](#)

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Notice of Removal; Notice of Removal to Federal Court; Electronic Filing Certificate of Service.

**Filed By:** J BRENT DULLE**On Behalf Of:** CITY OF ST LOUIS MISSOURI☐ **Entry of Appearance Filed**

Entry of Appearance; Electronic Filing Certificate of Service.

**Filed By:** ROBERT J ISAACSON**On Behalf Of:** ANGELA HAWKINS, KELLI SWINTON, LAWRENCE O'TOOLE, SAMUEL D DOTSON III**01/10/2017** ☐ **Entry of Appearance Filed**

Entry - Dulle for City; Electronic Filing Certificate of Service.

**Filed By:** J BRENT DULLE**On Behalf Of:** CITY OF ST LOUIS MISSOURI**12/28/2016** ☐ **Corporation Served**

Document ID - 16-SMCC-19577; Served To - DOTSON, SAMUEL D; Server - ; Served Date - 21-DEC-16; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

☐ **Corporation Served**

Document ID - 16-SMCC-19576; Served To - O'TOOLE, LAWRENCE; Server - ; Served Date - 21-DEC-16; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

☐ **Corporation Served**

Document ID - 16-SMCC-19574; Served To - HAWKINS, ANGELA; Server - ; Served Date - 21-DEC-16; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

☐ **Corporation Served**

Document ID - 16-SMCC-19573; Served To - CITY OF ST LOUIS MISSOURI; Server - ; Served Date - 21-DEC-16; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

☐ **Notice of Service**

Summons Served.

**Filed By:** JEREMY DANIEL HOLLINGSHEAD**On Behalf Of:** KAYLA ROBINSON☐ **Notice of Service**

Summons Served.

**Filed By:** JEREMY DANIEL HOLLINGSHEAD☐ **Notice of Service**

Summons Served.

**Filed By:** JEREMY DANIEL HOLLINGSHEAD

☐ **Notice of Service**

Summons Served.

**Filed By:** JEREMY DANIEL HOLLINGSHEAD

☐ **Notice of Service**

Summons Served.

**Filed By:** JEREMY DANIEL HOLLINGSHEAD

☐ **Corporation Served**

Document ID - 16-SMCC-19575; Served To - SWINTON, KELLI; Server - ; Served Date - 21-DEC-16; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

**12/19/2016** ☐ **Summons Issued-Circuit**

Document ID: 16-SMCC-19577, for DOTSON, SAMUEL D.

☐ **Summons Issued-Circuit**

Document ID: 16-SMCC-19576, for O'TOOLE, LAWRENCE.

☐ **Summons Issued-Circuit**

Document ID: 16-SMCC-19575, for SWINTON, KELLI.

☐ **Summons Issued-Circuit**

Document ID: 16-SMCC-19574, for HAWKINS, ANGELA.

☐ **Summons Issued-Circuit**

Document ID: 16-SMCC-19573, for CITY OF ST LOUIS MISSOURI.

**12/12/2016** ☐ **Motion Special Process Server**

Request for Appointment of Process Server.

**Filed By:** JEREMY DANIEL HOLLINGSHEAD

**On Behalf Of:** KAYLA ROBINSON

☐ **Judge/Clerk - Note**

PLEASE REFILE A NEW REQUEST FOR SPECIAL PROCESS SERVER, JOEL ST PIERRE IS NOT ON THE COURT APPROVED LIST.

**11/30/2016** ☐ **Jury Trial Scheduled**

**Scheduled For:** 05/22/2017; 9:00 AM ; MICHAEL KELLAN MULLEN; City of St. Louis

☐ **Motion Special Process Server**

Request for Appointment of Process Server.

**Filed By:** JEREMY DANIEL HOLLINGSHEAD

**On Behalf Of:** KAYLA ROBINSON

**11/16/2016** ☐ **Judge/Clerk - Note**

SUMMONS NOT ISSUED. PLEASE E-FILE EITHER MOTION FOR SPECIAL PROCESS SERVER OR \$180.00 FOR CITY SHERIFF FEES.

**11/15/2016** ☐ **Filing Info Sheet eFiling**

**Filed By:** JEREMY DANIEL HOLLINGSHEAD

☐ **Note to Clerk eFiling**

**Filed By:** JEREMY DANIEL HOLLINGSHEAD

☐ **Pet Filed in Circuit Ct**

Petition.

**Filed By:** JEREMY DANIEL HOLLINGSHEAD

**On Behalf Of:** KAYLA ROBINSON

☐ **Judge Assigned**

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI**

**KAYLA ROBINSON,**

Plaintiff,

v.

**CITY OF ST. LOUIS, MISSOURI**

**Serve at:**

City Counselor's Office

St. Louis City Hall

1200 Market Street, Room 314

and

**ANGELA HAWKINS,**

individually and in her official capacity,

and

**KELLI SWINTON,**

individually and in her official capacity,

and

**LAWRENCE O'TOOLE,**

individually and in his official capacity,

and

**COLONEL D. SAMUEL**

**DOTSON III,**

individually and in his official capacity,

**Serve all individuals at:**

Liason Office

1915 Olive Street

St. Louis, MO 63103

Defendants.

Case No.

Division No.

**JURY TRIAL DEMANDED**

## **PETITION**

COMES NOW Plaintiff Kayla Robinson (“Plaintiff”), by and through undersigned counsel, and for her Petition, states to this Honorable Court as follows:

### **NATURE OF THE ACTION**

1. This is a civil rights action brought under 42 U.S.C. § 1983 concerning the actions of Defendant City of St. Louis police officers in unreasonably searching and using excessive and unreasonable force against Plaintiff in violation of the Fourth and Fourteenth Amendments to the United States Constitution. The actions and conduct of the Defendant police officers are the result of a policy, practice, custom, and deliberate indifference on the part of Defendant City of St. Louis, Missouri, as well as its agents acting in both the individual and official capacities.

### **PARTIES**

2. Plaintiff is a female citizen of the State of Missouri, residing in St. Louis, Missouri.

3. Defendant City of St. Louis, Missouri (“Defendant City of St. Louis”) is a governmental entity in the State of Missouri and owns, operates, manages, directs, and controls the St. Louis Metropolitan Police Department, which employs Defendants Angela Hawkins, Kelli Swinton, Lawrence O’Toole and D. Samuel Dotson, III.

4. Defendant Angela Hawkins (“Defendant Hawkins”) is and was at all times relevant to this Petition an officer with the St. Louis Metropolitan Police Department (“SLMPD”). She is sued both in her individual and official capacity.

5. Defendant Kelli Swinton (“Defendant Swinton”) is and was at all times relevant to this Petition an officer with SLMPD. She is sued both in her individual and official capacity.

6. Defendant Lawrence O’Toole (“Defendant O’Toole”) is and was at all times relevant to this Petition an officer and lieutenant colonel with SLMPD. He is sued both in his individual and official capacity.

7. Defendant D. Samuel Samuel Dotson III (“Defendant Dotson”) is and was at all times relevant to this Petition an officer, colonel, and chief of police for the SLMPD. He is sued both in his individual and official capacity.

8. At all relevant times to this Petition, Plaintiff is under information and belief that Defendants O’Toole and Dotson had policymaking authority over the policies and procedures of the SLMPD.

9. At all times relevant to this Petition, Defendants Hawkins, Swinton, and O’Toole acted in concert and conspiracy and were jointly and severally responsible for the harms caused to Plaintiff.

10. At all times relevant to this Petition, each Defendant police officer acted under color of state law prescribed to them.

### **JURISDICTION AND VENUE**

11. The allegations contained in all aforementioned Paragraphs are hereby realleged and incorporated as if fully set forth herein.

12. Jurisdiction and venue are proper in the City of St. Louis, State of Missouri pursuant to RSMo. § 508.010.

13. Plaintiff's cause of action arises out of conduct that took place in the City of St. Louis, State of Missouri.

**FACTUAL ALLEGATIONS COMMON TO ALL COUNTS**

14. The allegations contained within all aforementioned Paragraphs are hereby realleged and incorporated as if fully set forth herein.

15. On or about the night of October 19, 2012, Plaintiff was the front-seat passenger in a vehicle driven by the father of her children, Ronnell Jenkins (hereinafter sometimes referred to as "Jenkins"). Jenkins' brother, Richard Jones (hereinafter sometimes referred to as "Jones"), was also traveling in the vehicle and was the back-seat passenger.

16. At the aforementioned date and time, Plaintiff, Jenkins, and Jones were leaving a St. Louis Cardinals baseball game and traveling on Goodfellow Boulevard in the City of St. Louis heading towards Jenkins' and Jones' great-grandmother's home.

17. As Jenkins was traveling on Goodfellow Boulevard heading towards Natural Bridge Road, police lights came on in a vehicle traveling behind them. As such, Jenkins immediately pulled over to the side of the road.

18. After pulling over, several police vehicles approached Jenkins' vehicle from every direction. Several police officers left said police vehicles and approached Jenkins' vehicle with their guns drawn.

19. Seeing the officers with their guns drawn, Plaintiff, Jenkins, and Jones all put their hands up in the air so as to show the officers that they were unarmed and not a threat to the officers.

20. Plaintiff, Jenkins, and Jones were all immediately forcibly removed from the vehicle by the police officers and taken to the street's curb. After initially being placed on the curb, Plaintiff turned over a small bag of marijuana to one of the officers. This was the only illegal substance or object Plaintiff had possession of at the time of the police encounter, which she immediately and voluntarily gave to the officers.

21. After Plaintiff, Jenkins, and Jones were removed from the vehicle, the vehicle was searched. Each of the individuals were also searched as soon as they were removed from the vehicle and placed on the curb.

22. Plaintiff's shoes were immediately removed upon being placed on the curb, and she was searched by Defendant Hawkins.

23. After initially searching Plaintiff, Defendant Hawkins falsely claimed that she saw Plaintiff "put something in her pants" and put Plaintiff in handcuffs and pulled Plaintiff approximately 200 feet away to a nearby tractor trailer parking lot.

24. Upon entering the tractor trailer parking lot, Defendant Hawkins pushed Plaintiff up against a parked trailer and told Plaintiff that she was going to search Plaintiff's pants.

25. Plaintiff became extremely threatened and fearful and began to plead with Defendant Hawkins not to search her in the parking lot, but rather at the police station.

26. Defendant Hawkins responded by becoming angry and screaming vulgar and degrading comments at Plaintiff, including, but not limited to:

- a. Calling Plaintiff a "crack head" because "she lives in Overland (a north St. Louis County municipality)";



- b. Continuously calling Plaintiff a “bitch”; and
- c. Telling Plaintiff that she was “going to have her children taken away from her” and that she would “never be able to finish school once [Defendant Hawkins] found heroin on [Plaintiff].”

27. Upon shoving Plaintiff against the parked trailer, Defendant Hawkins demanded that Plaintiff tell her “where the dope and guns were.”

28. Plaintiff insisted she had never so much as seen heroin in her life and did not have any guns.

29. Defendant Hawkins then called another officer over her radio and asked for a pair of gloves because she was going to search Plaintiff right then and there.

30. Shortly thereafter, a male police officer pulled his police vehicle directly behind Plaintiff and Defendant Hawkins, and he handed Defendant Hawkins a pair of gloves. The male officer then walked back to his car and stood right next to the front door, watching Defendant Hawkins search Plaintiff.

31. Defendant Hawkins put the gloves on, turned Plaintiff around so as to face the male officer, and began unbuttoning Plaintiff’s pants. At this time, Plaintiff was crying hysterically and begging Defendant Hawkins to take her to jail and search her there.

32. Defendant Hawkins instead forced Plaintiff to bend over and placed her fingers inside Plaintiff’s vagina.

33. After finding no drugs on Plaintiff during the course of this unreasonable and unlawful search, Defendant Hawkins fastened Plaintiff’s pants and slammed her with excessive force into the parked trailer. Defendant Hawkins then tightened Plaintiff’s

handcuffs to an extent that Plaintiff's skin was cut and began screaming at Plaintiff, calling her a "stupid bitch."

34. Plaintiff then began to have a panic attack and started struggling to breathe as Defendant Hawkins escorted Plaintiff back towards Jenkins' vehicle.

35. Approximately halfway between the tractor trailer parking lot and Jenkins' vehicle, Defendant Hawkins stopped and bent over, pretending to pick something up off the ground.

36. Defendant Hawkins then began screaming and yelling at Plaintiff once again, accusing Plaintiff of possessing whatever item Defendant Hawkins allegedly picked up off the ground.

37. Plaintiff opposed Defendant Hawkins' notion, stating that she had already been thoroughly searched without finding any illegal objects.

38. Defendant Hawkins then threw Plaintiff into the back of a police vehicle in which Defendant Swinton was sitting.

39. Defendant Swinton began yelling at Plaintiff and accused her of "having dope."

40. Defendant Swinton told Plaintiff to confess to "having dope," and the officers would let her go and, instead, arrest Jenkins for possession of illegal drugs.

41. Plaintiff refused to confess to possessing dope and insisted that she did not have any drugs in her possession, nor had she ever so much as seen heroin.

42. Defendant Hawkins then came back to the police vehicle and again told Plaintiff to “just tell her it was [Jenkins’] dope” and she would allow Plaintiff to drive home.

43. Defendant Hawkins then began questioning Plaintiff about Jones, stating that Jones was lying about his name. Plaintiff insisted that this accusation was not true and that “Richard Jones” was his real name.

44. Defendant Hawkins became angry and stated that “they all (Plaintiff, Jenkins, and Jones) were going to jail,” and that Plaintiff would be charged with possession of cocaine, despite the fact that she did not possess cocaine.

45. Shortly thereafter, Plaintiff was transported to jail where she was questioned by some male police officers.

46. During the course of questioning, Plaintiff suffered another anxiety attack which caused her to vomit. One of the officers then stated that Plaintiff “must be high on something” if she was vomiting. Plaintiff insisted she was not.

47. Plaintiff was then taken to an interview room and seated at a table across from Defendant Swinton.

48. Defendant Swinton began yelling at Plaintiff, demanding to know where she got the drugs. During the course of the interview, Defendant Swinton attempted to coerce Plaintiff into writing a statement that the drugs belonged to Jenkins.

49. Plaintiff again insisted she did not have any drugs and refused to sign a statement incriminating Jenkins.

50. Plaintiff then informed Defendant Swinton of Defendant Hawkins' actions during the course of the aforementioned "search." Plaintiff also put this information in a written statement which she turned in to Defendant Swinton.

51. After turning the statement in to Defendant Swinton, Plaintiff informed Defendant Swinton that she wanted a lawyer.

52. Defendant Swinton ignored Plaintiff's request for an attorney and read Plaintiff's statement. Defendant Swinton then began laughing, telling Plaintiff she was "stupid" and "going to end up dead."

53. Defendant Swinton then began yelling and cursing at Plaintiff once again, to which Plaintiff responded by again requesting an attorney and medical care for the injuries she suffered as a result of Defendant Hawkins' "search."

54. Defendant Swinton responded by telling Plaintiff that her lawyer "can't help her" and that "he isn't Jesus."

55. Shortly thereafter, Plaintiff was informed that she was being arrested for possession of marijuana and crack cocaine. Plaintiff was then transferred to the City of St. Louis Justice Center at about 3:00 am on October 20, 2012.

56. During the intake process at the Justice Center, Plaintiff saw a doctor and informed her of the details surrounding the abuse she suffered at the hands of Defendant Hawkins. Plaintiff was informed that her report of abuse would be documented.

57. Plaintiff was finally released, pending a warrant, at approximately 11:00 a.m. on October 20, 2012.

58. Shortly after being released, Plaintiff went to SLMPD's Internal Affairs Department and filed a report detailing Defendant Hawkins' actions.

59. As part of her Internal Affairs' report, Plaintiff was interviewed by Defendant O'Toole. During the interview, Defendant O'Toole asked Plaintiff to identify the officer that assaulted her in a photo book containing pictures of various SLMPD officers.

60. Plaintiff correctly identified Defendant Hawkins as the perpetrator. Defendant O'Toole responded by attempting to coerce Plaintiff into thinking she had identified the wrong officer.

61. Defendant O'Toole asked Plaintiff "how she could be so sure" that she had identified the correct officer. Defendant O'Toole also stated that Defendant Hawkins' name was not on Plaintiff's arrest report, implying that Defendant Hawkins could not have been the perpetrator. Plaintiff stated that Defendant Hawkins was definitely the perpetrator.

62. After the interview, Defendant O'Toole informed Plaintiff that he was going to investigate the incident and that Plaintiff would be notified of the outcome of the investigation within three (3) months.

63. Defendant O'Toole also attempted to get a DNA sample from Plaintiff, which Plaintiff declined.

64. Defendant O'Toole never notified Plaintiff of the results of the Internal Affairs investigation.

65. It was not until approximately October 12, 2015 that Plaintiff was informed of the outcome of the Internal Affairs investigation, and Plaintiff was only informed

because she personally called Internal Affairs to request the disposition of the investigation as part of her *pro se* attempt to expunge her arrest record.

66. Upon contacting Internal Affairs, Plaintiff was informed that her allegations against Defendant Hawkins were sustained. The report did not detail whether or not any disciplinary actions were taken against Defendant Hawkins.

67. During her *pro se* efforts to expunge her arrest record, Plaintiff obtained the incident report from the night of her arrest. Plaintiff noticed several pieces of false information in the incident report, including, but not limited to:

- a. The incident report stating that Plaintiff suffered no injuries on the night of her arrest; and
- b. The incident report stating that Plaintiff failed to give a written statement or report the events on the night of her arrest.

68. Plaintiff was never officially charged with any crime stemming from the events on the night of her arrest.

69. Plaintiff's arrest record has since been expunged.

70. At no time during the events described above, particularly during the physical encounter with Defendant Hawkins, did Plaintiff use any force against Defendant Hawkins or any other police officer or do anything that would have provided Defendant Hawkins with any legal basis to use force against her.

71. As a result of Defendant Hawkins' use of force against and unreasonable search and seizure of Plaintiff, Plaintiff suffered physical injuries and severe mental and emotional trauma.

72. There was no legal cause to justify the search of Plaintiff, and the search of Plaintiff was unreasonable.

73. There was no legal cause to justify the use of force against Plaintiff, and the force used against Plaintiff was unreasonable and excessive.

74. At all times relevant to this Petition, the conduct of Defendants was a willful, reckless, and malicious disregard of Plaintiff's rights under federal and state law.

75. Plaintiff is under information and belief that the aforementioned violations of Plaintiff's constitutional rights is part of a pattern and practice of similar behavior on the part of Defendants.

76. As a direct and proximate result of the conduct of all Defendants, Plaintiff has suffered – and continues to suffer – physical and psychological harm, pain and suffering, personal humiliation, garden variety emotional distress, and other related compensatory damages.

**COUNT I:**  
**UNREASONABLE SEARCH IN VIOLATION OF THE FOURTH AND**  
**FOURTEENTH AMENDMENTS, COGNIZABLE UNDER 42 U.S.C. § 1983**  
*As to Defendant Hawkins*

77. The allegations contained in all aforementioned Paragraphs are hereby realleged and incorporated as if fully set forth herein.

78. Defendant Hawkins' actions violated Plaintiff's rights under the Fourth Amendment to be free from unreasonable searches, including, but not limited to, the following:

- a. Defendant Hawkins, through her conduct described herein, subjected Plaintiff to a “strip search” and “body cavity search”;
- b. Defendant Hawkins’ strip search of Plaintiff was done in public in front of a male police officer;
- c. Defendant Hawkins’ strip search was not done in an effort to minimize emotional and physical trauma, as it was done in an abusive manner and in a place capable of exciting more fear onto Plaintiff;
- d. Defendant Hawkins’ body cavity search of Plaintiff was done in public in front of a male police officer;
- e. Defendant Hawkins’ body cavity search was not done in an effort to minimize emotional and physical trauma, as it was done in an abusive manner and in a place capable of exciting more fear onto Plaintiff;
- f. Defendant Hawkins’ body cavity search was not done in a medically approved manner;
- g. Defendant Hawkins did not have probable cause to engage in a strip search or body cavity search of Plaintiff;
- h. Defendant Hawkins did not have a search warrant authorizing her to perform a strip search or body cavity search of Plaintiff; and
- i. There were no exigent circumstances or other exceptions to the warrant requirement justifying Defendant Hawkins’ warrantless strip search and body cavity search.



79. Defendant Hawkins had no legal cause to justify her strip search and body cavity search of Plaintiff, and the search of Plaintiff was not reasonably necessary to arrest Plaintiff, take Plaintiff into custody, or stop Plaintiff for investigation.

80. Defendant Hawkins was acting under color of state law prescribed to her in her actions described herein.

81. As a direct and proximate result of the conduct of Defendant Hawkins, Plaintiff has suffered – and continues to suffer – physical and psychological injuries, personal humiliation, pain and suffering, garden variety emotional distress, and other related compensatory damages.

82. As shown by the foregoing, Defendant Hawkins' conduct was willful, wanton, and malicious, and showed complete indifference to and/or conscious disregard for the rights of others, including the rights of Plaintiff, thus justifying an award of punitive damages in an amount sufficient to punish Defendant and/or deter her and others similarly situated from such conduct in the future.

83. Plaintiff is under information and belief that the aforementioned violations of Plaintiff's constitutional rights is part of a pattern and practice of similar behavior on the part of Defendant.

84. Plaintiff is entitled to reasonable attorneys' fees pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff prays this Honorable Court award Plaintiff damages – compensatory, nominal, and/or punitive – in such an amount in excess of \$25,000.00 as is

deemed fair and reasonable; for reasonable attorneys' fees; for costs; for interest as allowed by law; and for such other and further relief deemed just and proper.

**COUNT II:**  
**THE UNLAWFUL USE OF EXCESSIVE FORCE IN VIOLATION OF THE**  
**FOURTH AND FOURTEENTH AMENDMENTS,**  
**COGNIZABLE UNDER 42 U.S.C. § 1983**  
*As to Defendant Hawkins*

85. The allegations contained in all aforementioned Paragraphs are hereby realleged and incorporated as if fully set forth herein.

86. Defendant Hawkins' actions violated Plaintiff's rights under the Fourth Amendment to be free from the unlawful use of excessive force, including, but not limited to, the following:

- a. Defendant Hawkins forced Plaintiff to bend over, in public and in front of a male police officer, pulled Plaintiff's pants down, and put her fingers inside Plaintiff's vagina;
- b. Defendant Hawkins slammed Plaintiff into a parked tractor trailer while Plaintiff was in handcuffs; and
- c. Defendant Hawkins tightened Plaintiff's handcuffs to an extent that Plaintiff's skin was cut.

87. At no time during Defendant Hawkins' encounter with Plaintiff did Plaintiff use any force against Defendant Hawkins or any other police officer, nor did Plaintiff threaten to use force, nor did Plaintiff do anything that would have provided Defendant Hawkins a legal basis for using force against her.

88. Defendant Hawkins had no legal cause to justify the use of force against Plaintiff, and the force used against Plaintiff was excessive and not reasonably necessary to arrest Plaintiff, take Plaintiff into custody, or stop Plaintiff for investigation.

89. Defendant Hawkins was acting under color of state law prescribed to her and/or pursuant to policies, customs, and/or practices of Defendant City of St. Louis and/or the SLMPD in her actions described herein.

90. As a direct and proximate result of the conduct of Defendant Hawkins, Plaintiff has suffered – and continues to suffer – physical and psychological injuries, personal humiliation, pain and suffering, garden variety emotional distress, and other related compensatory damages.

91. As shown by the foregoing, Defendant Hawkins' conduct was willful, wanton, and malicious, and showed complete indifference to and/or conscious disregard for the rights of others, including the rights of Plaintiff, thus justifying an award of punitive damages in an amount sufficient to punish Defendant and/or deter her and others similarly situated from such conduct in the future.

92. Plaintiff is under information and belief that the aforementioned violations of Plaintiff's constitutional rights is part of a pattern and practice of similar behavior on the part of Defendant.

93. Plaintiff is entitled to reasonable attorneys' fees pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff prays this Honorable Court award Plaintiff damages – compensatory, nominal, and/or punitive – in such an amount in excess of \$25,000.00 as is

deemed fair and reasonable; for reasonable attorneys' fees; for costs; for interest as allowed by law; and for such other and further relief deemed just and proper.

**COUNT III:**  
**VIOLATION OF THE FOURTH AND FOURTEENTH AMENDMENTS,**  
**COGNIZABLE UNDER 42 U.S.C. § 1983**  
*As to Defendant City of St. Louis*

94. The allegations contained in all aforementioned Paragraphs are hereby realleged and incorporated as if fully set forth herein.

95. The violations of Plaintiff's constitutional rights under the Fourth and Fourteenth Amendments, Plaintiff's damages, and the conduct of Defendants were directly and proximately caused by the actions and/or inactions of Defendant City of St. Louis, which has encouraged, tolerated, ratified, and has been deliberately indifferent to the following policies, patterns, practices, and customs, and the need for more or different training, supervision, investigation, or discipline in the areas of:

- a. Legal cause to stop, detain, arrest, and criminally charge a citizen;
- b. The use of force by police officers;
- c. The proper exercise of police powers, including, but not limited to searches and seizures, the making of an arrest, the use of force, and the bringing of criminal charges;
- d. The failure to identify and take remedial action or disciplinary action against police officers who are the subject of civilian or internal complaints of misconduct;

- e. Police officers' use of their status as police officers to employ the use of force or to achieve ends not reasonably related to their police duties;
- f. The failure of police officers to follow established policies, procedures, directives, and instructions regarding searches and seizures, arrests, the use of force, and the institution of criminal charges under such circumstances as contained herein; and
- g. The practice among City of St. Louis police officers of instituting false charges against individuals whom the officers have subjected to unlawful force with the intention of precluding such individuals from instituting civil claims.

96. As a direct and proximate result of the conduct of Defendant City of St. Louis, Plaintiff has suffered – and continues to suffer – physical and psychological injuries, pain and suffering, personal humiliation, garden variety emotional distress, and other related compensatory damages.

97. As shown by the foregoing, Defendant City of St. Louis' conduct was willful, wanton, and malicious, and showed complete indifference to and/or conscious disregard for the rights of others, including the rights of Plaintiff, thus justifying an award of punitive damages in an amount sufficient to punish Defendant and/or deter it and others similarly situated from such conduct in the future.

98. Plaintiff is under information and belief that the aforementioned violations of Plaintiff's constitutional rights is part of a pattern and practice of similar behavior on the part of Defendants.

99. Plaintiff is entitled to reasonable attorneys' fees pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff prays this Honorable Court award Plaintiff damages – compensatory, nominal, and/or punitive – in such an amount in excess of \$25,000.00 as is deemed fair and reasonable; for reasonable attorneys' fees; for costs; for interest as allowed by law; and for such other and further relief deemed just and proper.

**COUNT IV:**  
**FAILURE TO TRAIN RESULTING IN THE DEPRIVATION OF RIGHTS**  
**UNDER THE FOURTH AND FOURTEENTH AMENDMENTS,**  
**COGNIZABLE UNDER 42 U.S.C. § 1983**  
*As to Defendants City of St. Louis, Dotson and O'Toole*

100. The allegations contained in all aforementioned Paragraphs are hereby realleged and incorporated as if fully set forth herein.

101. As demonstrated herein, Defendant Hawkins' actions and/or inactions deprived Plaintiff of her Constitutional rights to be free from unreasonable searches and seizures and from the unlawful use of excessive force as guaranteed by the Fourth and Fourteenth Amendments.

102. At all times relevant herein, Defendant Hawkins acted under color of law prescribed to her.

103. At all times relevant herein, Plaintiff is under information and belief that the training policies of Defendants City of St. Louis, Dotson, and O'Toole were not adequate to train their police officers to handle the usual and recurring situations with which they must deal.

104. Defendants City of St. Louis, Dotson, and O'Toole were deliberately indifferent to the obvious consequences of their failure to train its police officers adequately.

105. The failure of Defendants City of St. Louis, Dotson, and O'Toole to provide adequate training caused the deprivation of Plaintiff's rights by Defendant Hawkins; that is, Defendants' failure to train is so closely related to the deprivation of Plaintiff's Constitutional rights as to be the moving force that caused the ultimate injury.

106. Defendants City of St. Louis, Dotson, and O'Toole were or should personally have been aware that Plaintiff faced a substantial risk of serious harm by failing to properly train their subordinate officers as set forth herein.

107. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered – and continues to suffer – physical and psychological injuries, personal humiliation, pain and suffering, garden variety emotional distress, and other related compensatory damages.

108. As shown by the foregoing, Defendants' conduct was willful, wanton, and malicious, and showed complete indifference to and/or conscious disregard for the rights of others, including the rights of Plaintiff, thus justifying an award of punitive damages in an amount sufficient to punish Defendants and/or deter them and others similarly situated from such conduct in the future.

109. Plaintiff is under information and belief that the aforementioned violations of Plaintiff's constitutional rights is part of a pattern and practice of similar behavior on the part of Defendants.

110. No Defendant is entitled to qualified immunity for their actions.

111. Defendant City of St. Louis, as a municipality, is not entitled to qualified immunity and is separately liable for the municipality's policies, usages, customs, practices, and/or Defendant O'Toole's decisions as the final decision and policy maker.

112. Plaintiff is under information and belief that at all relevant times herein, Defendants Dotson and O'Toole had policymaking authority over the policies and procedures of the SLMPD that directly and proximately resulted in the deprivation of Plaintiff's constitutional rights.

113. Plaintiff is entitled to reasonable attorneys' fees pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff prays this Honorable Court award Plaintiff damages – compensatory, nominal, and/or punitive – in such an amount in excess of \$25,000.00 as is deemed fair and reasonable; for reasonable attorneys' fees; for costs; for interest as allowed by law; and for such other and further relief deemed just and proper.

**COUNT V:  
FAILURE TO SUPERVISE RESULTING IN THE DEPRIVATION OF RIGHTS  
UNDER THE FOURTH AND FOURTEENTH AMENDMENTS, COGNIZABLE  
UNDER 42 U.S.C. § 1983**

*As to Defendants St. Louis, Dotson, and O'Toole*

114. The allegations contained in all aforementioned Paragraphs are hereby realleged and incorporated as if fully set forth herein.

115. As demonstrated herein, Defendant Hawkins' actions and/or inactions deprived Plaintiff of her Constitutional rights to be free from unreasonable searches and



seizures and from the unlawful use of excessive force as guaranteed by the Fourth and Fourteenth Amendments.

116. Defendants O'Toole and Dotson personally knew that their subordinates, namely Defendant Hawkins, were engaging in the aforementioned acts which caused Plaintiff to face a substantial risk of serious harm.

117. Plaintiff is under information and belief that Defendants O'Toole and Dotson provided inadequate supervision of their subordinates, namely Defendant Hawkins, so as to ensure compliance with existing department policies and procedures, as well as appropriate "industry standards."

118. Plaintiff is under information and belief that Plaintiff's Constitutional violations as set forth herein were not the first committed by Defendant City of St. Louis employees, namely subordinates of Defendants Dotson and O'Toole.

119. Defendants Dotson and O'Toole made a deliberate choice not to provide adequate supervision over his subordinates.

120. Moreover, Defendants Dotson and O'Toole should have been aware of widespread abuse, meaning abuse that was obvious, flagrant, rampant, and of continued duration thus putting Defendants Dotson and O'Toole on notice of the need to take corrective action through heightened supervision of Defendant Dotson and O'Toole's subordinates.

121. At all times relevant herein, all individual Defendants were acting under color of law prescribed to them.

122. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered – and continues to suffer – physical and psychological injuries, personal humiliation, pain and suffering, garden variety emotional distress, and other related compensatory damages.

123. As shown by the foregoing, Defendants' conduct was willful, wanton, and malicious, and showed complete indifference to and/or conscious disregard for the rights of others, including the rights of Plaintiff, thus justifying an award of punitive damages in an amount sufficient to punish Defendants and/or deter them and others similarly situated from such conduct in the future.

124. No Defendant is entitled to qualified immunity for their actions.

125. Plaintiff is entitled to reasonable attorneys' fees pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff prays this Honorable Court award Plaintiff damages – compensatory, nominal, and/or punitive – in such an amount in excess of \$25,000.00 as is deemed fair and reasonable; for reasonable attorneys' fees; for costs; for interest as allowed by law; and for such other and further relief deemed just and proper.

**COUNT VI:**  
**CIVIL CONSPIRACY IN FURTHERANCE OF VIOLATIONS OF THE FOURTH**  
**AMENDMENT, COGNIZABLE UNDER 42 U.S.C. § 1983**  
*As to Defendants Hawkins, Swinton, and O'Toole*

126. The allegations contained in all aforementioned Paragraphs are hereby realleged and incorporated as if fully set forth herein.

127. Defendants Swinton and O'Toole knew that Defendant Hawkins performed an unreasonable search of and used excessive force against Plaintiff, thus violating Plaintiff's constitutional rights.

128. Said Defendants, with malice and with the intent to oppress Plaintiff, have deliberately, wrongfully, and unlawfully conspired with each other to violate Plaintiff's constitutional rights and concomitantly cover-up the wrongdoing of Defendant Hawkins.

129. In furtherance of said conspiracy, Defendants did, on or about October 19 and October 20, 2012, deliberately, wrongfully, and maliciously make out false and incomplete official reports and give a false and incomplete version of the events to other persons to cover up their own misconduct and the misconduct of Defendant Hawkins.

130. As a direct and proximate result of Defendants' deliberate, wrongful, and malicious acts in furtherance of said conspiracy, Plaintiff was deprived of her rights guaranteed in the United States Constitution.

131. As a direct and proximate result of Defendants' deliberate, wrongful, and malicious acts in furtherance of said conspiracy, Plaintiff has suffered – and continues to suffer – physical and psychological injuries, pain and suffering, personal humiliation, garden variety emotional distress, and other related compensatory damages.

132. Defendants, at the time of said conspiracy, were each acting in their representative capacities with the SLMPD and Defendant City of St. Louis and under color of law.

133. As shown by the foregoing, Defendants' conduct was willful, wanton, and malicious, and showed complete indifference to and/or conscious disregard for the rights

of others, including the rights of Plaintiff, thus justifying an award of punitive damages in an amount sufficient to punish Defendants and/or deter them and others similarly situated from such conduct in the future.

134. Said Defendants are jointly and severally liable to Plaintiff for the damages outlined in this Count.

135. Plaintiff is under information and belief that the aforementioned violations of Plaintiff's constitutional rights is part of a pattern and practice of similar behavior on the part of Defendants.

136. Plaintiff is entitled to reasonable attorneys' fees pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff prays this Honorable Court award Plaintiff damages – compensatory, nominal, and/or punitive – in such an amount in excess of \$25,000.00 as is deemed fair and reasonable; for reasonable attorneys' fees; for costs; for interest as allowed by law; and for such other and further relief deemed just and proper.

Respectfully submitted,

/s/ Jeremy D. Hollingshead  
Hollingshead, Paulus, Eccher & Fry  
Jeremy D. Hollingshead #60447MO  
7777 Bonhomme Avenue, Suite 2401  
Saint Louis, Missouri 63105  
Telephone: (314) 480-5474  
Facsimile: (314) 594-0825  
Email: j.hollingshead@hpelaw.com

ATTORNEY FOR PLAINTIFF

In the  
**CIRCUIT COURT**  
 City of St. Louis, Missouri



For File Stamp Only

Kayla Robinson

Plaintiff/Petitioner

November 30, 2016

Date

vs.

1622-CC11297

Case number

City of St. Louis, Missouri

Defendant/Respondent

1

Division

### REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now Plaintiff, pursuant

Requesting Party

to Local Rule 14, requests the appointment by the Circuit Clerk of

Joel St. Pierre

100 Main Street, St. Peters, MO 63376 618-444-3972

Name of Process Server

Address

Telephone

Name of Process Server

Address

Telephone

Name of Process Server

Address

Telephone

to serve the summons and petition in this cause on the below named parties.

SERVE:

City of St. Louis, Missouri

Name

1200 Market Street, Room 314

Address

Saint Louis, Missouri 63103

City/State/Zip

SERVE:

Angela Hawkins

Name

1915 Olive Street

Address

Saint Louis, Missouri 63103

City/State/Zip

SERVE:

Kelli Swinton

Name

1915 Olive Street

Address

Saint Louis, Missouri 63103

City/State/Zip

SERVE:

Lawrence O'Toole

Name

1915 Olive Street

Address

Saint Louis, Missouri 63103

City/State/Zip

Appointed as requested:

**TOM KLOEPPINGER**, Circuit Clerk

Jeremy D. Hollingshead

Attorney/Plaintiff/Petitioner  
6044

By

Deputy Clerk

Bar No.

7777 Bonhomme Ave., Ste. 2401

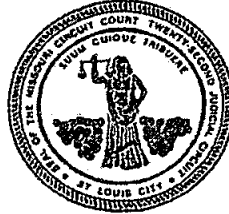
Address

314-480-5474

Phone No.

Date

In the  
**CIRCUIT COURT**  
 City of St. Louis, Missouri



For File Stamp Only

Kayla Robinson  
 Plaintiff/Petitioner

November 30, 2016

Date

vs.

1622-CC11297

Case number

City of St. Louis, Missouri  
 Defendant/Respondent

1

Division

### **REQUEST FOR APPOINTMENT OF PROCESS SERVER**

Comes now Plaintiff, pursuant

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100 Main Street, St. Peters, MO 63376 618-444-3972

Name of Process Server

Address

Telephone

Name of Process Server

Address

Telephone

Name of Process Server

Address

Telephone

to serve the summons and petition in this cause on the below named parties.

SERVE:

Colonel D. Samuel Dotson III

Name

1915 Olive Street

Address

Saint Louis, Missouri 63103

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Appointed as requested:

**TOM KLOEPPINGER**, Circuit Clerk

By

Deputy Clerk

Date

SERVE:

Name

Address

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Jeremy D. Hollingshead

Attorney/Plaintiff/Petitioner  
6044

Bar No.

7777 Bonhomme Ave., Ste. 2401

Address

314-480-5474

Phone No.

#### RULE 14 SPECIAL PROCESS SERVERS

1. Any person appointed by the Court or the Circuit Clerk to serve process must have a license issued pursuant to this rule to serve process.
2. Licenses to serve process shall be issued by the Sheriff of the City of St. Louis if the applicant has met the following qualifications:
  - a. Is twenty-one years of age or older;
  - b. Has a high school diploma or an equivalent level of education;
  - c. Has insurance coverage for any errors or omissions occurring in the service of process;
  - d. Has not been convicted, pleaded guilty to or been found guilty of any felony, or of any misdemeanor involving moral turpitude; and,
  - e. Has passed a training course for the service of process which shall be administered by the Sheriff of the City of St. Louis.
3. Each applicant for a process server license under the provisions of this rule shall provide an affidavit setting forth such person's legal name, current address, any other occupations and current telephone numbers. Licensed process servers shall immediately notify the Sheriff of the City of St. Louis of any change in the above information, and the failure to do so shall constitute good cause for the revocation of such person's license.
4. The Sheriff of the City of St. Louis shall maintain a list of persons licensed to serve process pursuant to this rule, and shall make such list available to litigants upon request.
5. A photo identification card designed by the Sheriff of the City of St. Louis shall be issued in addition to the license. No other identification will be allowed. All licenses must be signed and approved by the Sheriff of the City of St. Louis and the Presiding Judge or his designee.
6. A license fee recommended by the Sheriff and approved by the Court En Banc shall be charged to cover the costs of compiling and maintaining the list of process servers and for the training of such process servers. The license fees shall be made payable to the Sheriff of the City of St. Louis.

7. A license for service of process issued under this rule may be revoked by the Sheriff with the approval of the Presiding Judge or his designee, for any of the following reasons:

- a. Misrepresentation of duty or authority;
- b. Conviction, guilty plea or finding of guilty of any state or federal felony, or a misdemeanor involving moral turpitude;
- c. Improper use of the license;
- d. Making a false return; or
- e. Any other good cause.

Provided, no service of process made by an appointed process server with a revoked license shall be void if the Court or Circuit Clerk made the appointment in good faith without knowledge of the license revocation.

8. Any person authorized to serve process may carry a concealed firearm as allowed by Section 506.145, RSMo, only while actually engaged in the service of process and only if the person has passed a firearms qualification test approved by a law enforcement agency; provided, however, that any licensed special process server may file a written waiver of the right to carry a concealed firearm and thereby avoid the requirements of firearm training and testing. Any violation of this section shall be considered beyond the scope of the privilege to carry a concealed weapon that is granted by the appointment, and shall constitute good cause for the revocation of the license.
9. Applications for the appointment of a special process server shall be made on forms available in the offices of the Sheriff and Circuit Clerk. Orders Appointing special process servers may list more than one licensed server as alternatives.
10. The licenses granted pursuant to this rule shall be good for two years. Each person granted a license shall be required to reapply at the expiration of the license and shall be required to provide all the information required in the initial application, including a current police record check.

(Approved 9/28/92; amended 11/23/92; 5/31/95; 12/17/07)



In the  
**CIRCUIT COURT**  
 City of St. Louis, Missouri



For File Stamp Only

Kayla Robinson

Plaintiff/Petitioner

December 12, 2016

Date

vs.

1622-CC11297

Case number

City of St. Louis, Missouri

1

Defendant/Respondent

Division

### **REQUEST FOR APPOINTMENT OF PROCESS SERVER**

Comes now Plaintiff, pursuant

Requesting Party

to Local Rule 14, requests the appointment by the Circuit Clerk of

William Sidney

6731 Etzel, St. Louis, MO 63130

(314) 305-9369

Name of Process Server

Address

Telephone

Name of Process Server

Address

Telephone

Name of Process Server

Address

Telephone

to serve the summons and petition in this cause on the below named parties.

SERVE:

City of St. Louis, Missouri

Name

1200 Market Street, Room 314

Address

Saint Louis, Missouri 63103

City/State/Zip

SERVE:

Angela Hawkins

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1915 Olive Street

Address

Saint Louis, Missouri 63103

City/State/Zip

SERVE:

Kelli Swinton

Name

1915 Olive Street

Address

Saint Louis, Missouri 63103

City/State/Zip

SERVE:

Lawrence O'Toole

Name

1915 Olive Street

Address

Saint Louis, Missouri 63103

City/State/Zip

Appointed as requested:

**TOM KLOEPPINGER**, Circuit Clerk

Jeremy D. Hollingshead

Attorney/Plaintiff/Petitioner

60447

By

Deputy Clerk

Bar No.

7777 Bonhomme Avenue, Suite 2401

Address

(314) 480-5474

Phone No.

Date

In the  
**CIRCUIT COURT**  
 City of St. Louis, Missouri



For File Stamp Only

Kayla Robinson  
 Plaintiff/Petitioner

December 12, 2016

Date

vs.

1622-CC11297

Case number

City of St. Louis, Missouri  
 Defendant/Respondent

1

Division

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Requesting Party

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Name

1915 Olive Street

Address

Saint Louis, Missouri 63103

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Appointed as requested:

**TOM KLOEPPINGER**, Circuit Clerk

By

Deputy Clerk

Date

SERVE:

Name

Address

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Jeremy D. Hollingshead

Attorney/Plaintiff/Petitioner  
60447

Bar No.

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Phone No.

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  - d. Has not been convicted, pleaded guilty to or been found guilty of any felony, or of any misdemeanor involving moral turpitude; and,
  - e. Has passed a training course for the service of process which shall be administered by the Sheriff of the City of St. Louis.
3. Each applicant for a process server license under the provisions of this rule shall provide an affidavit setting forth such person's legal name, current address, any other occupations and current telephone numbers. Licensed process servers shall immediately notify the Sheriff of the City of St. Louis of any change in the above information, and the failure to do so shall constitute good cause for the revocation of such person's license.
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- c. Improper use of the license;
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8. Any person authorized to serve process may carry a concealed firearm as allowed by Section 506.145, RSMo, only while actually engaged in the service of process and only if the person has passed a firearms qualification test approved by a law enforcement agency; provided, however, that any licensed special process server may file a written waiver of the right to carry a concealed firearm and thereby avoid the requirements of firearm training and testing. Any violation of this section shall be considered beyond the scope of the privilege to carry a concealed weapon that is granted by the appointment, and shall constitute good cause for the revocation of the license.
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(Approved 9/28/92; amended 11/23/92; 5/31/95; 12/17/07)

**SPECIAL PROCESS SERVER****IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	Special Process Server 2
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Other Tort		(Date File Stamp)

**Summons in Civil Case**

The State of Missouri to: CITY OF ST LOUIS MISSOURI  
Alias:

CITY COUNSELORS OFFICE  
ST LOUIS CITY HALL  
1200 MARKET STREET ROOM 314  
SAINT LOUIS, MO 63103

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**December 19, 2016**

Date

*Thomas Kheppinger*

Clerk

Further Information:

**Sheriff's or Server's Return**

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years.  
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_

(name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

**Sheriff's Fees**

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Sheriff's Deputy Salary \$ \_\_\_\_\_  
 Supplemental Surcharge \$ 10.00  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**SPECIAL PROCESS SERVER****IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	Special Process Server 2
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Other Tort		(Date File Stamp)

**Summons in Civil Case**

The State of Missouri to: ANGELA HAWKINS

Alias: INDIVIDUALLY AND IN HER OFFICIAL CAPACITY

LIASON OFFICE  
1915 OLIVE STREET  
SAINT LOUIS, MO 63103

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**December 19, 2016**

Date

Clerk

Further Information:

**Sheriff's or Server's Return****Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

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- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

(name) (title).

☐ other

Served at (address)

in (County/City of St. Louis), MO, on (date) at (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on (date).

My commission expires: Date

Notary Public

**Sheriff's Fees**

Summons \$

Non Est \$

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$

Mileage \$ ( miles @ \$. per mile)

**Total** \$

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**SPECIAL PROCESS SERVER****IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	Special Process Server 2
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Other Tort		(Date File Stamp)

**Summons in Civil Case****The State of Missouri to: KELLI SWINTON****Alias: INDIVIDUALLY AND IN HER OFFICIAL CAPACITY**

LIASON OFFICE  
1915 OLIVE STREET  
SAINT LOUIS, MO 63103

COURT SEAL OF



CITY OF ST LOUIS

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**December 19, 2016**

Date

*Thomas Koeppinger*

Clerk

Further Information:

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☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

\_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

**Sheriff's Fees**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

**Total** \$ \_\_\_\_\_A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**SPECIAL PROCESS SERVER****IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	Special Process Server 2
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Other Tort		(Date File Stamp)

**Summons in Civil Case****The State of Missouri to: LAWRENCE O'TOOLE****Alias: INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY**

LIASON OFFICE  
1915 OLIVE STREET  
SAINT LOUIS, MO 63103

COURT SEAL OF



CITY OF ST LOUIS

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**December 19, 2016**

Date

Clerk

Further Information:

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- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

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My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

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Summons \$ \_\_\_\_\_

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Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

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Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY  Special Process Server 2  Special Process Server 3  (Date File Stamp)
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Other Tort		

**Summons in Civil Case**The State of Missouri to: **SAMUEL D DOTSON III**Alias: **INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY**

LIASON OFFICE  
1915 OLIVE STREET  
SAINT LOUIS, MO 63103

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**December 19, 2016**

Date

Clerk

Further Information:

**Sheriff's or Server's Return****Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

(name) (title).

☐ other

Served at (address)

in (County/City of St. Louis), MO, on (date) at (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on (date).

My commission expires: Date Notary Public

**Sheriff's Fees**

Summons \$

Non Est \$

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ ( miles @ \$. per mile)

**Total** \$A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.


**SPECIAL PROCESS SERVER**
**IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	Special Process Server 2
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Other Tort		(Date File Stamp)

**Summons in Civil Case**

The State of Missouri to: **CITY OF ST LOUIS MISSOURI**

Alias:

CITY COUNSELORS OFFICE  
ST LOUIS CITY HALL  
1200 MARKET STREET ROOM 314  
SAINT LOUIS, MO 63103

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**December 19, 2016**

Date

*Thomas Kloppeinger*

Clerk

Further Information:

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

*T. McDermott*

(name)

*Attorney Manager*

(title)

☐ other

Served at *1200 Market Street Rm. 314*

(address)

in *St. Louis*

(County/City of St. Louis)

MO, on *12/21/16*

(date)

at *10:29 AM*

(time)

*Jill M. St. Pierre*

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

**Sheriff's Fees**

Summons

\$

Non Est

\$

Sheriff's Deputy Salary

Supplemental Surcharge

\$

10.00

Mileage

\$

(\_\_\_\_ miles @ \$\_\_\_\_ per mile)

Total

\$

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.





# SPECIAL PROCESS SERVER

## IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	Special Process Server 2
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Other Tort		(Date File Stamp)

### Summons in Civil Case

The State of Missouri to: ANGELA HAWKINS

Alias: INDIVIDUALLY AND IN HER OFFICIAL CAPACITY

LIASON OFFICE  
1915 OLIVE STREET  
SAINT LOUIS, MO 63103

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

December 19, 2016

Date

Further Information:

*Thomas Koeppinger*  
Clerk

#### Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☒ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Jessica Luna (name) Legal Secretary (title).

☐ other

Served at 1915 Olive Street (address)  
in St. Louis (County/City of St. Louis), MO, on 12/21/16 (date) at 10:10 AM (time).

Joel M. St. Pierre  
Printed Name of Sheriff or Server

[Signature]  
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

#### Sheriff's Fees

Summons

\$ \_\_\_\_\_

Non Est

\$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge

\$ \_\_\_\_\_

10.00

Mileage

\$ \_\_\_\_\_

(\_\_\_\_\_ miles @ \$\_\_\_\_\_ per mile)

Total

\$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



# SPECIAL PROCESS SERVER

## IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	Special Process Server 2
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Other Tort		(Date File Stamp)

### Summons in Civil Case

The State of Missouri to: **KELLI SWINTON**  
Alias: **INDIVIDUALLY AND IN HER OFFICIAL CAPACITY**

LIASON OFFICE  
1915 OLIVE STREET  
SAINT LOUIS, MO 63103

**COURT SEAL OF**  
  
**CITY OF ST LOUIS**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**December 19, 2016**

Date \_\_\_\_\_ Clerk \_\_\_\_\_

Further Information: \_\_\_\_\_

*Jessica Luna*  
Legal Secretary

*Thomas Kloppeinger*

### Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☒ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Jessica Luna (name) Legal Secretary (title).

☐ other \_\_\_\_\_

Served at 1915 Olive Street (address)

in St. Louis (County/City of St. Louis), MO, on 12/21/16 (date) at 10:10 AM (time).

Jool M. St. Pierre  
Printed Name of Sheriff or Server

[Signature]  
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

### Sheriff's Fees

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.





# SPECIAL PROCESS SERVER

## IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	Special Process Server 2
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Other Tort		(Date File Stamp)

### Summons in Civil Case

The State of Missouri to: LAWRENCE O'TOOLE

Alias: INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY

LIASON OFFICE  
1915 OLIVE STREET  
SAINT LOUIS, MO 63103

*Jessica Luna*  
Legal Secretary

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

December 19, 2016

Date

*Thomas Koeppinger*  
Clerk

Further Information:

### Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☒ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

*Jessica Luna* (name) *Legal Secretary* (title).

☐ other

Served at *1915 Olive Street* (address)

in *St. Louis* (County/City of St. Louis), MO, on *12/21/16* (date) at *10:10 AM* (time).

*Joel M. St. Pierre*  
Printed Name of Sheriff or Server

*Joel M. St. Pierre*  
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

### Sheriff's Fees

Summons

\$ \_\_\_\_\_

Non Est

\$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge

\$ 10.00

Mileage

\$ \_\_\_\_\_

(\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

Total

\$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



# SPECIAL PROCESS SERVER

## IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1622-CC11297	Special Process Server 1 WILLIAM SIDNEY  Special Process Server 2  Special Process Server 3  (Date File Stamp)
Plaintiff/Petitioner: KAYLA ROBINSON	Plaintiff's/Petitioner's Attorney/Address JEREMY DANIEL HOLLINGSHEAD 7777 BONHOMME AVE STE 2401 ST LOUIS, MO 63105	
Defendant/Respondent: CITY OF ST LOUIS MISSOURI	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Other Tort		

### Summons in Civil Case

The State of Missouri to: SAMUEL D DOTSON III

Alias: INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY

LIASON OFFICE  
1915 OLIVE STREET  
SAINT LOUIS, MO 63103

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**December 19, 2016**

Date

Clerk

Further Information:

### Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☒ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Jessica Luna (name) Legal Secretary (title).

☐ other

Served at 1915 Olive Street (address)  
 in St. Louis (County/City of St. Louis), MO, on 12/21/16 (date) at 10:10 AM (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

### Sheriff's Fees

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Sheriff's Deputy Salary \$ \_\_\_\_\_  
 Supplemental Surcharge \$ 10.00  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



**MISSOURI CIRCUIT COURT  
TWENTY-SECOND JUDICIAL CIRCUIT  
[ST. LOUIS CITY]**

**KAYLA ROBINSON,**

PLAINTIFF,

**v.**

**CITY OF ST. LOUIS, ANGELA HAWKINS,  
KELLI SWINTON, LAWRENCE O'TOOLE,  
& COLONEL D. SAMUEL DOTSON, III,**

DEFENDANTS.

**Cause No. 1622-CC11297**

---

**ENTRY OF APPEARANCE**

Associate City Counselor Brent Dulle hereby enters his appearance as counsel of record for Defendant City of St. Louis.

Respectfully submitted,  
MICHAEL A. GARVIN,  
CITY COUNSELOR

/s/ J. Brent Dulle #59705MO  
Associate City Counselor  
CITY OF ST. LOUIS LAW DEPARTMENT  
1200 Market Street  
City Hall Room 314  
St. Louis, Missouri 63103  
Phone: 314-622-4644  
Fax: 314-622-4956  
DulleB@stlouis-mo.gov

**CERTIFICATE OF SERVICE**

I hereby certify this Entry was electronically filed with the Court for service by means of Notice of Electronic Filing upon all attorneys of record on January 10, 2017.

/s/ J. Brent Dulle

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

KAYLA ROBINSON,	)	
	)	
Plaintiff,	)	
	)	Case No. 1622-CC11297
v.	)	
	)	
CITY OF ST. LOUIS, et al.,	)	
	)	
Defendants.	)	

**ENTRY OF APPEARANCE**

COME NOW Missouri Attorney General, Joshua D. Hawley, and Assistant Attorney General, Robert J. Isaacson, and hereby enter their appearance as counsel of record on behalf of Defendants Angela Hawkins, Kelli Swinton, Lawrence O'Toole and Colonel D. Samuel Dotson III and respectfully request that all future correspondence and pleadings in this matter be forwarded to their attention at the address below.

Respectfully submitted,

**JOSHUA D. HAWLEY**  
Attorney General

/s/Robert J. Isaacson  
Robert J. Isaacson, #38361MO  
Assistant Attorney General  
P.O. Box 861  
St. Louis, Missouri 63188  
(314) 340-7861 (Telephone)  
(314) 340-7029 (Facsimile)  
*Attorney for Defendants Hawkins,  
Swinton, O'Toole and Dotson*



CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2017, I electronically filed this document using the electronic filing system, which electronically notifies all counsel of record.

/s/Robert J. Isaacson  
Assistant Attorney General

**MISSOURI CIRCUIT COURT  
TWENTY-SECOND JUDICIAL CIRCUIT  
[ST. LOUIS CITY]**

**KAYLA ROBINSON,**

PLAINTIFF,

**v.**

**CITY OF ST. LOUIS, ANGELA HAWKINS,  
KELLI SWINTON, LAWRENCE O'TOOLE,  
& COLONEL D. SAMUEL DOTSON, III,**

DEFENDANTS.

**Cause No. 1622-CC11297**

---

**NOTICE TO STATE COURT AND TO PLAINTIFF  
OF FILING OF NOTICE OF REMOVAL**

Defendant City of St. Louis hereby notifies this Court and Plaintiff Kayla Robinson of the removal of the above-styled case from the Circuit Court of the City of St. Louis, State of Missouri, to the United States District Court for the Eastern District of Missouri, assigned cause number 4:17-cv-156. A copy of the Notice of Removal filed in the United States District Court on January 11, 2017 is attached.

Respectfully submitted,  
MICHAEL A. GARVIN,  
CITY COUNSELOR

/s/ J. Brent Dulle #59705MO  
Associate City Counselor  
CITY OF ST. LOUIS LAW DEPARTMENT  
1200 Market Street  
City Hall Room 314  
St. Louis, Missouri 63103  
Phone: 314-622-4644  
Fax: 314-622-4956  
DulleB@stlouis-mo.gov

**CERTIFICATE OF SERVICE**

I hereby certify this Notice was electronically filed with the Court for service by means of Notice of Electronic Filing upon all attorneys of record on January 11, 2017.

/s/ J. Brent Dulle

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**KAYLA ROBINSON,**

PLAINTIFF,

**v.**

**CITY OF ST. LOUIS, ANGELA HAWKINS,  
KELLI SWINTON, LAWRENCE O'TOOLE,  
& COLONEL D. SAMUEL DOTSON, III,**

DEFENDANTS.

**Cause No.**

---

**NOTICE OF REMOVAL TO FEDERAL COURT**

Defendant City of St. Louis ("City") notifies this Court of the removal of *Robinson v. City of St. Louis, et al.*, Cause No. 1622-CC11297, from the 22nd Judicial Circuit Court of Missouri, to the U.S. District Court for the Eastern District of Missouri. As grounds for removal, City states:

1. On November 15, 2016, Plaintiff Kayla Robinson ("Plaintiff") filed a six-count lawsuit against these Defendants in the 22nd Judicial Circuit Court of Missouri, styled as *Robinson v. City of St. Louis, et al.*, Cause No. 1622-CC11297.
2. All six counts of Plaintiff's Petition allege the Defendants violated Plaintiff's rights secured by the Fourth or Fourteenth Amendments to the United States Constitution in violation of 42 U.S.C. § 1983. Petition, pp. 12-25.
3. On December 28, 2016, Plaintiff effected service on all Defendants.
4. Counsel for City has conferred with counsel for Defendants Hawkins, Swinton, O'Toole, and Dotson; all Defendants consent to this removal.
5. City files this notice within thirty days after service, making removal timely under 28 U.S.C. § 1446(b) and *Murphy Brothers, Inc. v. Michetti Pipe Stringing, Inc.*, 526 U.S. 344, 354-355 (1999).
6. Pursuant to Local Rule 2.03 a copy of all process, pleadings, orders and other documents on file in state court are attached as Exhibit A.

7. Venue is proper in this District under 28 U.S.C. § 1441(a), because this District and Division embrace the place in which the removed action has been pending.

8. Plaintiff's claims in all counts of her state-court Petition unequivocally implicate federal constitutional rights and federal statutory rights, thus this Court has original jurisdiction under 28 U.S.C. § 1331.

9. City concurrently submits the filing fee in the amount of \$400.00 and the proof of filing the notice of removal with the Clerk and State court.

WHEREFORE, Defendant petitions this Court for removal of *Robinson v. City of St. Louis, et al.*, Cause No. 1622-CC11297, from the 22nd Judicial Circuit Court of Missouri, to this Court for all further proceedings.

Respectfully submitted,  
MICHAEL A. GARVIN,  
CITY COUNSELOR

/s/ J. Brent Dulle #59705MO  
Associate City Counselor  
CITY OF ST. LOUIS LAW DEPARTMENT  
1200 Market Street  
City Hall Room 314  
St. Louis, Missouri 63103  
Phone: 314-622-4644  
Fax: 314-622-4956  
DulleB@stlouis-mo.gov

**CERTIFICATE OF SERVICE**

I hereby certify this Notice was electronically filed with the Court for service through the electronic filing system and also sent via email to: Jeremy Hollingshead, HOLLINGSHEAD, PAULUS, ECCHER & FRY, Attorney for Plaintiff, j.hollingshead@hpelaw.com, on January 11, 2017.

/s/ J. Brent Dulle